

## **EXHIBIT 8**

1 UNITED STATES DISTRICT COURT FOR THE  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X

4 Jane Doe 1, individually and on behalf of  
all others similarly situated,

5

6 Plaintiff,

Case No.

1:22-cv-10019 (JSR)

7 v.

8 JPMorgan Chase Bank, N.A.,

Defendant.

9 -----

10 GOVERNMENT OF THE UNITED STATES  
VIRGIN ISLANDS,

11 Case No.

1:22-cv-10904 (JSR)

12 Plaintiff,

13 v.

14 JPMORGAN CHASE BANK, N.A.,

15 Defendant

16 -----

17 \*\* CONFIDENTIAL PORTION UNDER SEPARATE COVER \*\*

18 \*\* DEPOSITION OF MARY ERDOES \*\*

19 Wednesday, March 15, 2023

20

21

22

23 Reported by:

24 Angela M. Shaw-Crockett, CCR, CRR, RMR

1           Q.    Were you aware that Mr. Epstein traded  
2   foreign exchange with JPMorgan Chase?

3           A.    I don't recall the specifics of  
4   Mr. Epstein's relationship.

5           Q.    In an earlier email -- or, not an email --  
6   or a rapid response memo, there was indication that  
7   the private bank would only be providing banking  
8   services.

9                   Do you recall that?

10          A.    Yes, I recall that.

11          Q.    Does that mean cash management,  
12   essentially?

13          A.    "Banking relationships" generally means  
14   banking activity of checking, just non -- not things  
15   like stock trading and hedge fund management.

16          Q.    Do you know whether there was another  
17   branch or line of business within JPMorgan Chase  
18   that handled any foreign exchange trading equity  
19   trading, fixed-income trading?

20          A.    Am I aware there's another -- say that  
21   question again.

22          Q.    Bad question.

23                   JPMorgan Chase acquired Bear Stearns at  
24   some point, correct?

1           A.     Correct.

2           Q.     Do you know whether Mr. Epstein did any  
3     trading activities through Bear Stearns?

4           A.     I don't know what Mr. Epstein did with  
5     Bear Stearns.

6           Q.     I'm sorry?

7           A.     I don't know what Mr. Epstein's  
8     relationship was with Bear Stearns.

9           Q.     Okay. Private banking can handle what  
10    I'll call "traditional brokerage services," correct?

11          A.     Correct.

12          Q.     But it can also simply provide banking  
13    services and have another part of, if you will, the  
14    JPMorgan family, handle brokerage and execution  
15    services, correct?

16          A.     Correct.

17          Q.     And you don't know whether that was split  
18    in the case of Mr. Epstein?

19          A.     No, I don't know.

20          Q.     Okay. If you read -- continue to read  
21    here on this due diligence report, it says "he,"  
22    meaning Mr. Epstein, "manages money for  
23    high-net-worth individuals, specifically Leslie  
24    Wexner."